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ENVIRONMENTAL INC.
CHEMPRO Division

Carrie
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WASTE MANAGEMENT BRANCH

April 19, 1991

Ms. Cindy Gilder
Supervisor
Hazardous Waste Permits Section
Washington Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Re: Revision and Review of Draft Part B Permit Application
for Chemical Processors, Inc. Pier 91 Facility

Dear Ms. Gilder:

On several occasions in recent months, I have discussed with you the probability that Chempro will ask Ecology to defer review of the Pier 91 Part B Permit Application and proceed with review of permit applications for other Chempro facilities (i.e., Kent or Tacoma). Our commitment to that request is now certain; the reasons for the request are documented below.

1) The Pier 91 Facility is the only Chempro TSD facility operating on leased land. We are currently negotiating renewal of our lease with the property owner (Port of Seattle), but the time frame for conclusion of these negotiations is not clear. It is hoped that negotiation of short-term issues may be concluded by June 1991, but the question of long-term lease renewal may not be resolved for another year. Without long-term lease renewal, it is possible our operations at the facility may conclude in December 1993.

2) Without a certain timeframe for extension of our lease, Chempro hesitates to have Ecology staff or our own staff spend any more time in the near future on permit review and revision, NODs and NOD responses, SEPA Checklist review, draft permit writing and review, etc. Since there are permit applications for other Chempro facilities still awaiting review, as well as permit applications from other TSDs, we feel strongly that deferring review of the Pier 91 permit application will result in more effective use of everyone's time.

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We recognize that you have projected a steady schedule for review of many permit applications between now and November 1992. Our request that you defer review of the Pier 91 Part B Permit Application and proceed with review of permit applications for other Chempro facilities is not an attempt to slow Ecology's overall schedule for Part B permit review and issuance. We are only asking you to change the order in which you review those applications, so that our time and yours may be used more effectively on permit applications not affected by the question of lease negotiations. We believe your overall schedule for permit review and issuance can still be maintained, and that this request will simply allow time for further development of lease negotiations during the next year.

We are still planning to provide you with Pier 91 permit application revisions on May 1, 1991, as requested in your letter of March 6, 1991. A demonstration of compliance with state siting standards for the Pier 91 Facility will also be provided on that date.

Please contact me at 223-0500 if you have any questions about this request. I am also available to meet with you if you want to discuss our request in person. We thank you for your careful consideration of our request, and look forward to hearing from you soon.

Sincerely,



Catherine L. Buller
Environmental Programs Manager

cc: Carrie Sikorski, EPA